

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of)	MAIL STOP APPEAL BRIEF
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Lewis K. Cirne et al.)	Group Art Unit: 2454
)	
Application No.: 10/635,669)	Examiner: Wen Tai Lin
)	
Filed: August 7, 2003)	Confirmation No.: 8894
)	
For: EVENT ROUTING MECHANISM IN A)	
COMPUTER SYSTEM)	

REPLY BRIEF

Commissioner for Patents
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Sir:

This Reply Brief is being filed in response to points of argument raised in the Examiner's Answer dated March 23, 2011.

Hao Lacks The Order of Claim 1, Namely, Receiving An Event

Even if the Examiner were correct that Hao discloses each of the claimed steps, the steps identified in Hao are not performed in the order recited by claim 1.

Claim 1 recites "determining a routing mechanism for the received event." The use of the antecedent "the" combined with the past tense "received" means that the "determining" step must occur after the receiving step. Similarly, claim 1's recitation of "receiving an event specifying an assigned routing type" means that the event must already specify an assigned routing type when it is received. Therefore, any art that is alleged to anticipate cannot receive an event and then assign and determine routing. However, this is precisely the order that Hao discloses.

In particular, Hao lacks "receiving an event specifying an assigned routing type" because Hao "does not rely on any additional assigning procedure [beyond source-originated information] to distribute these events." Examiner's Answer, pg. 8. Instead of receiving events specifying an assigned routing type, Hao et al. designed the IEP to be able

to receive input events from non-modified applications, where the lack of modification prevents an routing type from having been assigned. Hao, abstract.

Further, Hao does not have a "receiving" step between mapping an event as shared or unshared and multicasting the event. As per above, the Examiner has identified Hao's mapping as corresponding to the claimed "assigning" and multicasting as a "routing mechanism."

The Examiner misunderstands the role of assigning routing types for the "geometric coordinates" and "input focus" routing types of the Appellant's specification. The Examiner also mischaracterizes Appellant's Fig. 10. As explained above, the "receiving" step occurs after an event has been assigned a routing type. Accordingly, Fig. 10 is described with "[p]referably, the routing type is determined by examining a routing type field in the HI event, as previously discussed with FIG. 4." Para. 0070. Therefore, the events in Fig. 10 have been assigned a routing type even if this is not shown in Fig. 10.

Fig. 11 clarifies both of the Examiner's misunderstandings. Elements 1102, 1120 and 1130 depict the process determining a routing type and then processing each routing type differently. An event is not processed based on its geometric coordinates (1104-1110) unless the event already specifies a geometric coordinate type. Put another way, geometric coordinates alone cannot be used to route an event because the event might be a "focus" routing type.

In contrast, Hao does not need to assign a routing type, because Hao decides whether or not to multicast an event by mapping its location within a window hierarchy data array. Hao, abstract.

Hao Lacks An Event Specifying An Assigned Routing Type

Claim 1 additionally recites "an event specifying an assigned routing type." In contrast, the shared/unshared mapping of Hao does not modify the input event, or otherwise cause an event to specify information. An input event in Hao cannot be assigned a routing

type because the decision to multicast an input event is done by mapping to a dynamic data array, and this dynamism prevents an input event itself from specifying whether or not it is to be multicast, as the input event does not contain enough information.

The Examiner misunderstands what was meant by "predefined descriptor." Appeal Brief, pg. 11. The predefined descriptor is not merely that an event is a mouse click versus a key press, but rather routing types as depicted in Fig. 4. One embodiment of the claimed invention assigns all mouse click events to the geometric routing type, and all display contrast changes to the broadcast type. Hao, in contrast, lacks the insight that different types of events should be routed differently, rather, Hao focuses on uniformly routing events. Hao, col. 8, ln. 54 "[i]nput events are then multicast to all shared windows."

Hao Lacks Determining A Routing Mechanism

Claim 1 recites "determining a routing mechanism." Hao discloses that the IEP performs multicast. Hao does not disclose other methods for the IEP to send input to applications, thus Hao lacks "determining a routing mechanism." To preclude other theories of anticipation, Appellant notes that the IEP is essential to other aspects of the Examiner's anticipation theory.

Independent claims 13, 25, 29, 33, 36, 41, 43, 45, 50, 55 and 58, although of different scope than claim 1, include distinguishing features similar to the above-noted features of claim 1. Thus, Hao cannot support a rejection of claims 13, 25, 29, 33, 36, 41, 43, 45, 50, 55 and 58 for at least the reasons given above for claim 1.

Dependent Claims

Claim 2 recites "said routing type is a member of a set including a first routing type that is routed based on geometric coordinates of an event and a second routing type that is routed based on an input focus."

In contrast, the Examiner argues that geometric information and input focus are "inherent information." The claim, however, recites that these are two different routing types. Even if Hao provided both types of information, Hao routes solely by mapping to the window hierarchy. Hao, abstract. Additionally, Hao does not disclose assigning input focus information to an input event.

Claim 3 recites "wherein the set further includes a third routing type." The Examiner argues that the multicast of Hao is equivalent to "broadcast." However, the Examiner has not identified three separate routing types disclosed in Hao, because the elements that the Examiner found to correspond to the two types recited in claim 2 are present in multicast. The "inherent information" of Hao and multicast are fundamentally different, and thus cannot each be a routing type.

Claim 4 recites "an extensible plurality of routing types." The Examiner instead argues that Hao discloses that the IEP can multicast to different numbers of applications. However, this does not constitute different routing types, as "[i]nput events are then multicast to all shared windows." Hao, col. 8, ln. 54.

Claim 6 recites "the event is sent to each client which registered interest." The Examiner cited sharing and unsharing input events. However, this functionality only determines whether or not the event is sent, it does not determine which clients receive the event.

Dependent claims 2-11, 14-23, 26, 27, 30, 31, 34, 35, 37, 38, 40, 46-48, 51-53, 56 and 60-65 are also allowable at least due to their corresponding dependence from the above discussed claims.

For any of the Examiner's remarks in the Answer that are not specifically addressed herein, Appellant relies on the arguments in the Appeal Brief, which is hereby incorporated by reference in its entirety. Appellant thus reasserts each of these arguments.

Respectfully submitted,

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